

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

Case No. 17-BK-3283(LTS)

(Jointly Administered)

**APPLICATION FOR ADMISSION *PRO HAC VICE***

Comes now, Keith R. Martorana, (hereafter, the "Applicant") and, pursuant to L. Dist. Ct. R. 83A(f) of the Local Rules of the United States District Court for the District of Puerto Rico, as incorporated by Rule 1001-l(b) of the Local Bankruptcy Rules as well as this Court's *Eleventh Amended Notice, Case Management and Administrative Procedures Order (Docket No.11885 of Case No. 17-03283 (LTS)) (the "CMP Order")*, hereby requests to be permitted to appear and participate in this particular case, in association with the law firm of McConnell Valdés, LLC, and the undersigned members of the bar of this Court, in representation of party-in-interest by Autopistas Metropolitanas de Puerto Rico, LLC ("Metropistas"),

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Applicant herein and respectfully states:

1. Applicant will sign all pleadings with the name “Keith R. Martorana”. Applicant has been retained as a member of the above-named firm by Autopistas Metropolitanas de Puerto Rico, LLC (“Metropistas”), to appear on its behalf in the above captioned cases now pending before the United States District Court for the District of Puerto Rico, and without waiving any of its affirmative defenses, including insufficient process, insufficient service of process or lack of jurisdiction.

2. Applicant is an attorney and a member of the law firm of Gibson, Dunn & Crutcher LLP, with offices at:

Address	200 Park Avenue, New York, NY 10166-0193
Email	KMartorana@gibsondunn.com
Telephone No.	212.351.3991
Fax No.	212.351.6391

3. Since February 24, 2008 applicant has been and presently is a member in good standing of the bar of the highest court of the State of New York, where applicant regularly practices law. Applicant’s bar license number is 4576971.

4. Applicant has been admitted to practice before the following courts:

Court	Admission Date
New York State	February 24, 2008
The Southern District of New York	March 24, 2009
The Eastern District of New York	March 24, 2009

5. Applicant is a member in good standing of the bars of the courts listed in paragraph 4 of

this Application.

6. Applicant is not currently suspended from the practice of law before any court or jurisdiction.

7. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding, or criminal charges before any court or jurisdiction.

8. Applicant has not been denied admission to, been disciplined by, resigned from, surrendered his license to practice before, or withdrawn an application for admission to practice before any court or jurisdiction, while facing a disciplinary complaint.

9. During the past three (3) years, applicant has not filed for *pro hac vice* admission in the U.S. District Court for the District of Puerto Rico, except that applicant filed an application in case Civil No. 3:20-cv-01094-PAD, that is pending to be adjudicated, (Docket 14).

10. Local counsel of record associated with applicant in this matter is:

Name	Nayuan Zouairabani
USDC-PR Bar	No. 226411
Address	270 Muñoz Rivera Avenue, Suite 7 Hato Rey, Puerto Rico 00918
Email	nzt@mcvpr.com
Telephone No.	787-250-5632
Fax No.	787-759-9225

11. Applicant has read the Local Rules of the United States District Court for the District of Puerto Rico, which provide in part that attorneys appearing *pro hac vice* must comply with the provisions set forth therein and pay an admission fee of \$300.00 per appearance in each new case before the Court. Accordingly, payment of the *pro hac vice* admission fee is attached hereto in the form of a check or money order payable to: "Clerk, U.S. District Court".

**WHEREFORE**, Applicant respectfully requests to be admitted to practice in the United

States District Court for the District of Puerto Rico.

Date: June 2, 2020.

Keith R. Martorana  
Printed Name of Applicant

/s/ Keith R. Martorana  
Signature of Applicant

**I HEREBY CERTIFY THAT**, pursuant to L. Dist. Ct. R. 83A(f) of the Local Rules of the United States District Court for the District of Puerto Rico, that I consent to the designation of local counsel for all purposes.

Date June 2, 2020.

Nayuan Zouairabani  
Printed Name of Local Counsel

/s/ Nayuan Zouairabani  
Signature of Local Counsel

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this June 2, 2020

**I HEREBY CERTIFY** that on this same date, we electronically filed the document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all CM/ECF participants.

**MCCONNELL VALDÉS LLC**  
Attorneys for Autopistas Metropolitanas  
de Puerto Rico, LLC  
270 Muñoz Rivera Avenue, Suite 7  
San Juan, Puerto Rico 00918  
Telephone: 787-250-5632  
Facsimile: 787-759-9225

By: s/Nayuan Zouairabani  
Nayuan Zouairabani, Esq  
USDC-PR Bar No. 226411  
Email: [nzt@mcvpr.com](mailto:nzt@mcvpr.com)